

# LAW OFFICES OF RUDY A. DERMESROPIAN, LLC

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July 10, 2024

## **Via ECF**

Honorable Denny Chin, U.S. Circuit Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York  
Institute of Technology, et al.***  
**Case No. 2:14-cv-04020(DC)(LGD)**

Dear Judge Chin:

This office was retained earlier today to represent the Plaintiff Ajay Bahl with regard to the post-trial proceedings in the above-referenced matter. We are still in the process of collecting and reviewing Mr. Bahl's voluminous trial record. As such, we submit this letter to respectfully request a brief extension of time to file post-trial motions from July 15, 2024 to August 5, 2024.

From our review of the Court's docket, it appears that this case was tried to a jury and the Court from June 10 to 14, 2024. We also see that Mr. Bahl's prior trial counsel had voluntarily withdrawn from the case effective June 18, 2024, which left Mr. Bahl without representation or assistance of counsel in preparing and filing post-trial motions, which are currently due on July 15, 2024.

The record also shows that after the conclusion of trial, Mr. Bahl had moved as a *pro se* litigant to delay the entry of final judgment by 90 days allowing him time to retain new counsel. Said motion was denied, in part, because it was moot considering that the Court had already entered final judgment. Your Honor also stated that "In light of the age of the case and all the circumstances," that the post-trial motions deadline will not be extended. We respectfully submit that the current request for an extension of time under the current circumstances is different since we are not seeking a 90-day delay in entry of final judgment, Mr. Bahl has now retained new counsel on this matter, we are in the process of retrieving and reviewing the entire trial record and the request for an extension of time is brief. We respectfully do not believe that a 3-week extension of time under the current circumstance would cause any prejudice or undue delay in this matter.

We were also informed that due to Mr. Bahl's disabilities, it took him longer than expected to locate and retain new counsel. A letter from Mr. Bahl's therapist should be provided to us sometime tomorrow discussing this matter further.

We certainly do recognize the long history of this case and Your Honor's denial of a delay in entry of final judgment. However, we cautiously and humbly request this brief extension of time allowing my office the opportunity to collect Plaintiff's files, fully review them and submit his post-trial motions.<sup>1</sup>

Earlier today, shortly after my office was retained, I sent an email to Defendants' counsel introducing myself and inquiring whether this request can be made on consent. I was informed that opposing counsel does not consent to this request.

We can assure the Court that my office will work as expeditiously as possible to meet any deadline set by the Court. However, in light of the circumstances that Mr. Bahl finds himself in after the withdrawal of his trial counsel and our ongoing process of retrieving his files, we respectfully request that Plaintiff's current deadline to file post-trial motions be briefly extended from July 15, 2024 to August 5, 2024. We appreciate the Court's time and attention to this matter.

Respectfully,

*/s/ Rudy A. Dermesropian*

Rudy A. Dermesropian  
Managing Member

cc: All counsel of record (via ECF)

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<sup>1</sup> Mr. Bahl will also be filing a notice of appeal by July 17, 2024 in order to preserve his right.